

# **Dawson College Policy on Integrity in Research and Scholarship**

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## 1. Introduction

Dawson College recognizes the need for scholarship, research, and innovation and is committed to promoting the highest standards of integrity in all of its members' scholarship and research initiatives.

Integrity in research is directly linked to the College's performance and reputation, and the responsible use of public funds. Individual cases of research misconduct can have negative impacts on the advancement of knowledge, lead to the commercialization of unsafe products or processes, and erode the public's trust in research. The research community - those who depend on and use research results - and the general public need to know that standards of integrity are being met, and that any anomalies are being dealt with effectively.

This policy defines the integrity framework for research and scholarship at Dawson College, and describes the education, guidance and support it provides to members of the college community. The College expects all those involved in, or associated with the research enterprise to adhere to accepted standards of integrity in their research activities. This policy endorses the standards of the *Tri-Council Policy Statement: Integrity in Research and Scholarship* (1994, hereafter TCPS-IRS), in conjunction with the collective agreements of unionized personnel of the College.

### 1.1. Scope & Objectives of the Policy

This policy and its adjuncts<sup>1</sup> address issues common to all areas of research. In this context, the policy applies to all individuals who conduct, support or facilitate research at, about, or with the approval of Dawson College. Within this scope, its objectives are to:

- a) Provide a clear and concise framework of the College's expectations with regard to standards of integrity in research and scholarship;
- b) Define the roles and responsibilities of the individual and the College administration;
- c) Promote high standards of integrity within the Dawson community; and
- d) Explain the College procedures for investigating and addressing allegations of misconduct in research.

## 2. Definitions

A **Researcher** is any Dawson employee who is engaged in an undertaking intended to extend knowledge or establish facts and principles of nature (science) and expression (arts, literature), through a disciplined inquiry or systematic investigation.

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<sup>1</sup> Related Dawson College Policies: (1) Conflict of Interest and Nepotism Policy; (2) Policy & Procedures Concerning the Acquisition of Goods and Services; (2) Dawson College Policy on the Ethical Conduct of Research Involving Humans.

**Integrity** is the quality of being honest, incorruptible, impartial and fair. The behaviours that characterize and demonstrate the principles of integrity in research and scholarship are described in section 3.1 below.

**Conflict of interest** is any circumstance in which individuals (or relations) may benefit or be perceived as benefiting (directly or indirectly) disproportionately from access to information or from a decision over which they may have influence.

**Misconduct** in research is any action or behaviour that is inconsistent with the terms of this policy and the TCPS-IRS and/or violates federal or provincial statutes or regulations. Misconduct may include, but is not limited to, one or more of the following actions:

- a) Fabrication or falsification of research data or results;
- b) Plagiarism or forgery of documents, including academic credentials;
- c) Failure to appropriately recognize the substantive contributions of students, co-researchers, or other collaborators;
- d) Use of the unpublished works of other researchers and scholars without permission or acknowledgement;
- e) Failure to use scholarly and scientific rigour and integrity in obtaining, recording, and analyzing data, and in reporting and publishing results;
- f) Use of research resources, facilities or equipment in a manner that is inconsistent with approved research practices;
- g) The misapplication, misuse or failure to account for funds granted, or acquired, to support research;
- a) Failure to comply with relevant legal requirements concerning the conduct of research, as specified in: federal or provincial statutes or regulations; research grants or contribution agreements; or the policies of the College;
- b) Failure to reveal any material conflict of interest to sponsors or to the College or those who commission the research; or
- c) Abuse of supervisory power affecting collaborators, assistants, students and others associated with the research.

### 3. Roles & Responsibilities

#### 3.1. Responsibilities of Researchers & Scholars

Under the articles of this policy and the TCPS-IRS, Dawson College and the Councils expect researchers and scholars who receive Agency funds to uphold basic principles of integrity. To this end, researchers and scholars must adhere to the following standards of conduct:

- a) Recognize any substantive contributions of collaborators and students, only use the unpublished work of other researchers and scholars with permission and due acknowledgement, and use archival material in accordance with the rules of the archival source;
- b) Obtain the permission of the author before using new information, concepts or data originally obtained through access to confidential manuscripts or other sources of unpublished materials;

- c) Use scholarly and scientific rigour and integrity in obtaining, recording and analyzing data, and in reporting and publishing results;
- d) Ensure that authorship of published work includes all those (and *only* those) who have materially contributed to, and share responsibility for, the contents of a publication;
- e) Reveal to sponsors, universities, journals or funding agencies, any material conflict of interests, financial or otherwise, that might influence decisions on whether the individual should be asked to review manuscripts or applications, test products or be permitted to undertake work sponsored from outside sources;
- f) Adhere to the terms and conditions of all project funding agreements, and with all official College policies which govern the conduct of research at Dawson;
- g) Demonstrate responsible stewardship of institutional and Agency resources provided to support research.

### 3.2. Responsibilities of Dawson College

In order to uphold the above standards of integrity in research and scholarship, Dawson College has the following institutional responsibilities:

- a) Promote integrity in research and scholarship within the Dawson community;
- b) Investigate possible instances of misconduct in research or scholarship, including:
  - i. Imposing appropriate sanctions in accordance with their own policies; and
  - ii. Informing the appropriate Council(s) of conclusions reached and actions taken.
- c) Report the findings of investigations of misconduct to the funding Agency if/when:
  - i. An allegation of misconduct has been forwarded to the Institution by the Agency (regardless of the outcomes of such enquiry(ies)); and
  - ii. An allegation of misconduct, made directly to the Institution and involving, directly or indirectly, funds from an Agency grant or award, has been investigated and confirmed/upheld by the Institution.

### 3.3. Responsibilities of the Councils

Dawson understands that the Councils are responsible to the Government of Canada for ensuring that all research funds which are administered by them are used with a high degree of integrity, accountability and responsibility.

The College understands that allegations of misconduct may arise from the peer review processes of the Councils. In the event that a Council, or one of its peer review committees, identifies evidence of misconduct as part of the peer review processes, the Council will request that the institution(s) involved carry out an enquiry and inform the Council of the outcome.

If the College has investigated and *upheld* an internal allegation of misconduct on the part of a grantee or awardee of Council funds, it recognizes that the Council(s) will consider the report and may request clarification or additional information. In cases where misconduct is concluded to have occurred, the Council(s) may consider imposing its/their own sanction(s) in relation to grants made to the individual(s) implicated, in accordance with Council policies. These sanctions may include, but are not limited to:

- a) refusing to consider future applications for a defined time period;
- b) withdrawing remaining installments of the grant or award;

- c) seeking a refund of all or part of the funds already paid as a grant or award for the research or scholarship involved.

If such actions are being considered, the Council(s) will provide an opportunity for the person(s) involved to present a response. The Council(s) will then inform the person(s) and the institution(s) involved of any impending sanction. As agencies of the federal government, the Councils retain the right at any time to bring a case to the attention of the appropriate legal authorities.

#### **4. Preventing Misconduct and Promoting Integrity in Research**

Dawson College is committed to upholding the highest possible standards of integrity in research and scholarship, and it respects this commitment by promoting its institutional research policies, issuing notice of important issues or developments, and providing ongoing education and training opportunities to community members.

At Dawson, the Academic Dean is the highest authority within the College with overall responsibility for research; and he/she is ultimately responsible for enforcing the principles and procedures defined in the Dawson's institutional research policies. These policies are continuously reviewed by a college-wide Research Advisory Committee (RAC) (a sub-committee of the College Senate), to ensure their compliance with standards of integrity and ethical conduct, as defined by Canada's Tri-Council and other research and government authorities. Once approved of the Board of Governors, any changes in College policy are promptly communicated to members of the community through regular channels of communication, including: (1) emails to an "All\_Dawson" listserv; (2) notices in relevant College publications; and/or (3) publication on the College web site.

The College's responsibility to provide ongoing education and training is assumed by the Office of Instructional Development (OID), which provides a range of support services for Dawson researchers. These services are provided to support of institutional priorities and are delivered to the extent is reasonable and feasible within the department's budgetary constraints. Working within this framework, the Coordinator of Research delivers individualized support and guidance to anyone wanting to conduct research at Dawson. From the early phases of inquiry to the conclusion of a research project, it is the Coordinator's responsibility to educate any active or prospective researchers about Dawson's policies on integrity and ethical conduct in research, *and* to support/facilitate their compliance with the basic principles and procedures that govern the conduct of research at Dawson College.

In addition to providing education and support to individual researchers, the OID's Coordinator of Research works with the Coordinator of Professional Development and the Coordinator Instructional Development, to build, deliver or organize targeted workshops and training for individuals, departments or disciplinary groups, on topics relating to ethical conduct and integrity in research. Many of these opportunities are devised in response to the expressed needs and interests of the research community. Such events may be marketed directly to College researchers and/or advertised broadly within the Dawson community, by way of: targeted and mass e-mails; notices in relevant College publications; or postings on the College web site.

## 5. Policy on Data Recording, Ownership and Retention

Dawson College expects researchers to maintain clear records of their research activities, and to ensure the secure storage of any collected data, in accordance with the terms and conditions defined in:

- a) the researcher's own approved research plan(s);
- b) formal agreements with a funding agency; or
- c) this policy and its adjuncts.

The principal researcher should maintain records of his/her research and any collected data for as long as there may exist a reasonable need to refer to the data. This is normally a minimum period of five (5) years. Where necessary and appropriate, researchers should be able to produce these records upon request.

In the case of research involving humans, any researcher who proposes to retain collected data for a period greater than ten (10) years must provide the Research Ethics Board (REB) with an acceptable rationale for its retention.

In addition to the researchers' files, the Office of Instructional Development (OID) maintains its own complete records of all research conducted with the College's support or within its jurisdiction.

In addition to the researchers' files, the Office of Instructional Development (OID) maintains complete records of all research conducted by members of the Dawson community, with the approval of the College. Each of these project files includes, at minimum, a copy of: the original research proposal or funding application; documentation of any scholarly or ethics review(s) of the research; and any reports or publications emerging from the research.

(All research conducted by the College in support of its own institutional development and reporting requirements is overseen by the Office of Institutional Research (OIR), which maintains central records of all institutional research).

## 6. Policy on Authorship and Publication

Under the terms of this policy and the TCPS-IRS, **authorship** implies a significant intellectual contribution to a work. More specifically "...authorship of published work includes all those [and *only* those] who have materially contributed to, and share responsibility for, the contents of the publication..." (TCPS-IRS, Principles and Responsibilities, Article 1.d).

Likewise, **co-authorship** and the ordering of authors on publications should reflect the actual contributions of various collaborators to the final manuscript(s). Relevant contributions to be taken into account may include, but are not limited to (1) the definition of the questions asked and hypotheses tested, (2) development of the research design and measurement procedures, including data collection, organization and interpretation, and (3) the actual writing of the manuscript.

The intended contributions of collaborators should be determined through understandings and agreements reached *prior* to the work being undertaken, and should be reviewed and verified at the conclusion of a project, prior to the submission of any manuscript(s) for publication.

## 7. Disclosure of Potential Conflicts of Interest

If an actual or perceived conflict of interest arises in the context of a scholarly or research initiative, it is the researcher's responsibility to disclose this conflict to the Academic Dean, in writing, at the earliest opportunity. The Academic Dean will take appropriate steps to address the situation, in accordance with the relevant and approved procedures defined in the (1) Dawson College policy on *Conflicts of Interest and Nepotism*, and/or (2) the *Dawson College Policy on the Ethical Conduct of Research Involving Humans*.

## 8. Internal Procedures for Managing Allegations of Misconduct

An allegation of misconduct may be brought against: a past or present grant holder; trainees or staff supported with research funds; or any individual working in connection with a project that is receiving grant funds.

The Academic Dean is responsible for receiving and investigating all allegations of misconduct in research, and for ensuring that due process is followed. If any other College administrator or supervisor is presented with an allegation of misconduct, he/she must refer the complaint to the Academic Dean. This referral is necessary to ensure that all allegations are treated seriously, and in a fair and consistent manner.

### 8.1. Registering an Allegation of Misconduct

Any individual, inside or outside the institution, can register an allegation of misconduct in research or scholarship with the Academic Dean. If an administrator becomes aware of possible misconduct in research, he/she must register a complaint with the Academic Dean.

Allegations of misconduct which are made to the Councils, about a Dawson researcher, will, likewise, be referred to the Academic Dean. Such allegations might also arise from the peer review processes of the Councils. The Councils will not transmit oral allegations to the institution, or otherwise act upon them, since these cannot be assessed or transferred accurately.

Any complaint which alleges misconduct must be registered with the Academic Dean, in writing, within three months of the alleged misconduct. The allegation must be signed and dated and contain sufficient detail to enable the Academic Dean to understand the allegation. Anonymous allegations will not normally be entertained. However, if the evidence is compelling, the Academic Dean may initiate an investigation into an anonymous complaint.

Under the provisions of the *Privacy Act*, the Academic Dean may not disclose the identity of the complainant without his/her explicit consent. Likewise, the Councils may only transmit an allegation with the permission of the person who is making it.

If the complainant has made an allegation in good faith, he/she will be protected from reprisals. However, an allegation made in bad faith (i.e., maliciously or in the knowledge that the allegation is without foundation) may itself be considered a breach of research integrity, and be subject to investigation and sanctions.

## **8.2. Processing an Allegation of Misconduct**

The Academic Dean must review an allegation of misconduct within ten (10) working days of receiving it. Within this timeframe, he/she may decide to either:

- a) Pursue an *informal* investigation of the complaint, if he/she determines that there is sufficient evidence to warrant such action; *or*
- b) Dismiss the allegation(s), if he/she finds that there are insufficient grounds to pursue an investigation.

Whether the Academic Dean chooses to dismiss the allegation or pursue an informal investigation, he/she must notify the respondent of the complaint, and inform both the complainant and the respondent of his/her decision.

If the Academic Dean decides to dismiss the allegation, the complainant may formally appeal this decision, in writing, within ten (10) working days of receiving notification of the Dean's decision. Appeals should be addressed to the Director General of the College, who will review the available information, and provide a final ruling on the matter, within ten (10) working days of receiving the appeal.

If the Director General overturns the Academic Dean's decision to dismiss the allegation, then he/she will refer the case back to the Academic Dean, who will be obliged to initiate an informal or formal investigation of the allegation(s), as recommended by the Director General.

## **8.3. Investigation Procedures**

### **8.3.1. Informal Investigation**

If the Academic Dean decides to pursue an informal investigation, then he/she must meet with the relevant parties, in an effort to resolve the issue(s) raised by the complainant in the allegation. These meetings should occur within twenty (20) working days of the Academic Dean's notification to the parties of his/her intent to conduct an informal investigation into the allegation(s).

If the above process does not produce an adequate or acceptable resolution, in the judgement of the Academic Dean, then he/she will initiate a formal investigation of the allegation.

If the informal investigation produces a resolution that *is* acceptable in the judgement of the Academic Dean, then he/she will document the resolution(s) in writing, and forward it to the relevant parties within ten (10) working days of a final meeting on the matter.



As above, if any party is dissatisfied with a resolution reached by the Academic Dean, then he/she will have ten (10) working days to submit a written appeal to the Director General, who will review the available information, and provide a final ruling on the matter within ten (10) working days.

### **8.3.2. Formal Investigation**

A formal investigation will be undertaken in the event that an informal investigation fails to adequately resolve the issues raised in an allegation of misconduct.

If the Academic Dean (or Director General) deems it necessary to undertake a formal investigation, then he/she must strike an ad hoc Research Integrity Committee (RIC); and may, depending on the nature, severity or merit of the allegation, ask the Financial Office to temporarily halt the transfer of funds from the grant until the matter is decided.

When its members have been confirmed, the Academic Dean will provide the RIC with all available documentation pertaining to the allegation, and will place the investigation in the charge of the RIC.

The RIC will, from this point, proceed to collect other relevant documentation, and will provide the complainant(s) and respondent(s) with the opportunity to present their version of the facts. In the course of its investigation, the RIC may request additional documentation from relevant College department(s), or interview other individuals involved in, or otherwise associated, with the matter under investigation.

The RIC should strive to gather all relevant documents and testimonials, and conclude its investigations within ninety (90) working days of the committee being formed and accepting its mandate.

At the conclusion of the investigation, the RIC must produce a report and submit its recommendations to the Academic Dean in writing, within ten (10) working days. Copies of this report should also be sent to the complainant(s) and respondent(s), within the same timeframe.

The RIC's report should contain:

- a) Details of the allegation;
- b) Names of RIC members and rationale for their appointment;
- c) Methods used to investigate the allegation;
- d) Summaries of the evidence gathered, through documentation or personal interviews; and
- e) Recommendations for action, including any proposed sanctions or measures required to restore reputations.

Sanctions may include reprimand, suspension, or reparations made to the complainant or others. Under existing collective agreements, the rights of the accused, such as the right to legal representation, will be respected. However, the RIC maintains the right to propose sanctions as appropriate to the offense.

At the conclusion of a formal investigation of misconduct, the Academic Dean must prepare a report and ensure its timely distribution to the relevant Agency or College body(ies).

If the investigation was requested by the funding Agency, a full copy of the report will be sent to the Agency whether or not misconduct is concluded to have occurred. If an investigation is initiated

internally and misconduct is found to have occurred in research funded by an Agency, the institution will provide the Agency with a copy of the report within thirty (30) days of the conclusion of the investigation.

#### **8.3.2.1. The Research Integrity Committee**

A Research Integrity Committee (RIC) should be struck within fifteen (15) working days of a decision by the Academic Dean (or Director General) to initiate a formal investigation. The RIC will consist of at least three members, and will have the authority to decide whether misconduct has been committed. Decisions of the RIC will be binding on the institution, unless the decision has been appealed and reversed.

The members of the RIC will be selected based on the nature of the allegation and the expertise required to properly investigate it. If the allegation relates to a research project involving humans, at least one member of the RIC should be recruited from the College's Research Ethics Board (REB), and be chosen for his/her expertise in ethical issues or the discipline of the research/researcher whose actions are under investigation.

When recruiting members for the RIC, the Academic Dean will ensure that the individuals are neither collaborators with the complainant or the respondent; and that they are able to judge all elements of the allegation in an impartial manner.

## **9. Privacy and Confidentiality**

The privacy of all individuals will be protected at all times during the complaint process, and documentation and materials will be recorded and held confidential in the files of the Academic Dean; this includes the parties involved in the dispute process and the determination. All documents pertaining to the matter being investigated will be kept for five years and access will be limited to the Academic Dean and his/her delegate. Access to the information must comply with Freedom of Information guidelines.

## **10. Appeals**

At any phase of the investigation process, an appeal by either the complainant or the respondent must be made to the Academic Dean or Director General, in writing, within ten (10) working days of the decision being communicated. The Academic Dean, whose decision is final, must rule on the appeal within ten (10) working days.